

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

CAMERON L. THOMAS,
Plaintiff,

v.

Case No. 2:21cv543

H. W. MARTIN, et al.
Defendants.

NOTICE OF REMOVAL

Defendants, H. W. Martin, R. M. Crowder, D. L. Todd, E. V. Zablan, B. A. Shum, and the City of Norfolk, by counsel, pursuant to 28 U.S.C. § 1441 and 1446, and petition the Court as follows:

1. That on September 4, 2020, an action (“Complaint”) was filed in Norfolk Circuit Court against the Defendants styled Cameron Thomas v. H. W. Martin, et al., Case No. CL20-7657. (attached as Exhibit 1).
2. The Circuit Court for the City of Norfolk is located within the territorial jurisdiction of the United States District Court for the Eastern District of Virginia, Norfolk Division.
3. The Complaint purports to state claims against the Defendants arising under federal law pursuant to 42 U.S.C. § 1983 for violation of her constitutional rights. See Complaint at ¶¶ 10 and 16.
4. The jurisdiction of this Court is established under 28 U.S.C. §§1331, 1343, 1441 and 42 U.S.C. §1983.
5. Venue is proper in the Norfolk Division of this District pursuant to 28 U.S.C. §1391(b)(2).
6. The Complaint was served on Defendants on or about September 4, 2021.

7. Defendants expect to file their responsive pleadings within the time provided by Fed.R.Civ.P. 81(c)(2)(C).

8. All of the Defendants agree to removal of this action.

WHEREFORE, Defendants invoke the jurisdiction of this Court. Plaintiff should govern himself accordingly.

**H. W. Martin, R. M. Crowder, D. L. Todd,
E. V. Zablan, B. A. Shum, City of Norfolk
Defendants.**

_____/s_____
Of Counsel

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Counsel to Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of September, 2021, I will electronically file the foregoing with the Clerk of the Court using the CM/EFC system, which will then send a notification of such filing (NEF) and by first class mail to the following:

Benjamin D. Bowers
Bowers & Gould, P.C.
4101 Granby Street, Suite 206
Norfolk, VA23504

_____/s_____
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